



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

JUN 5 2014

Ms. Deborah A. S. Hoag, P.E.  
Environmental Division Manager  
City of Reading  
815 Washington Street  
Reading, Pennsylvania 19601-3690

Re: Pretreatment Program  
NPDES No. PA0026549

Dear Ms. Hoag:

Thank you for the timely and generally complete submission of the City's annual pretreatment report for calendar year 2013. Thank you also for summarizing the influent, effluent, and sludge monitoring data on the spreadsheet provided by EPA. Use of the spreadsheet helps significantly with our processing of the data. For future reports, it would be helpful if all of the influent and effluent mercury data were included in the spreadsheet. Since the City conducted more than monthly monitoring for mercury, additional columns must be added to the spreadsheet to include all of the City's mercury data. The instructions sent with the spreadsheet should provide an explanation of how to add columns for the additional data, although if you need additional assistance please let me know. If more than one sample for the same sample point is collected on the same date, the results of the sampling for that date should be averaged and the average value entered in the spreadsheet. This occurred for the sludge on several sample dates and the City entered both results in the spreadsheet rather than averaging them. The instructions sent with the spreadsheet include a specific explanation on how to average the results where some or all of the data is reported as non-detectable. In addition to submitting the paper copy of the spreadsheet, it is also helpful if the spreadsheet is emailed or provided on a disk to allow for electronic processing of the data.

The City's report indicates that it assessed a significant number of penalties against the users for violations that occurred during the year. As occurs with many POTWs, not all of the penalties were paid as of the date of the report. In general, where not all of the assessed penalties were paid at the time of the report, follow-up information needs to be provided to show whether the penalties were eventually paid. Providing this update with the next annual report is sufficient, although it can also be provided with any response to the EPA comments on the report. To date I have not received an update on the unpaid penalties listed in the City's annual reports for calendar years 2008, 2009, 2010, 2011, and 2012. Enclosed for your use is a set of tables showing the penalties that were listed as not having been paid for each of these years along with unpaid penalties for calendar year 2013. Please provide an update on the status of payment of these penalties, including penalties shown as not yet paid in the 2013 report.

The narrative on page 4 of the report included permit language regarding spills and slug



discharges that has been included in the user permits since April 2010 and indicates that this language had been previously submitted to EPA. Please note that on February 7, 2011 I responded to Jacqueline Hendricks by email with comments on that language as well as other language in the City's user permits. To date I have not received a response to those comments. The permit language updates is one of the outstanding issues from the pretreatment audit conducted in 2005 and discussed below. If you need a copy of my comments on the permit language, please let me know. At a minimum, the City's permit language needs to be revised as the permits are reissued.

In reviewing the 2013 annual reports, EPA has continued the program in which specific pretreatment implementation items for each approved program are being tracked. For calendar year 2013, the measure that separately tracks significant noncompliance violations for user reporting (2012 measure 11) has been dropped, and significant noncompliance for reporting is now included in the other significant noncompliance measures (Measures 7 through 10). In addition, for measure 4 (data/local limits) the assessment of user violations has been dropped from the evaluation and the categorization for measure 4 is now based solely on the influent, effluent, and sludge data of measures 1, 2, and 3. For measure 6 (sludge compliance) the change in reporting for the annual sludge reports means that the compliance data is not available to us at this time so you will note that measure 6 is listed as "Not evaluated" in your measures table, and all POTWs will be getting credit for a category 1 listing for this measure for calendar year 2013. All other measures remain the same, although a few clarifying changes have been made to some of the other measures on the measures instruction sheet. Enclosed is a sheet that includes the data that I have collected for the Reading pretreatment program for calendar year 2013, as well as a sheet that provides some additional information on the categories listed. An "Instruction Sheet" that provides more detail on each measure (with any changes from the 2012 measures indicated in bold) is also enclosed. Generally, the category ratings are not directly related to compliance, but "Category 1" would be considered the best rating for each measure. Finally, a summary of all of the POTW data collected so far for calendar year 2012 has been included to allow you to compare your program to the ratings achieved by POTWs in calendar year 2012.

Measure 1 (influent data) is listed in category 2 for mercury and in category 3 for molybdenum. These exceedances continue the pattern of exceedances that have occurred over the last several years (see enclosed *List of Exceedances* report and data charts for mercury and molybdenum), and the City will need to take steps to address these pollutant levels.

Measure 2 (effluent data) is listed in category 2 for mercury. Based on a review of the past data submitted by the City, it appears that calendar year 2013 was the first time since calendar year 2008 that the City reported detectable levels of mercury in its effluent. Although only three of the sixty-one results submitted were detectable, the potential increase in the mercury levels is a concern.

Measure 3 (sludge data) is listed in category 2 for molybdenum. Again, these exceedances continue a pattern of exceedances that have occurred over several years, and the City should take steps to address these exceedances.

Measure 4 (data/local limits) is listed in category 3 for mercury and molybdenum. For



mercury, my understanding is that the water quality based effluent limit for the City's discharge was calculated to be higher than the current effluent goal. This may be at least partly the cause of the influent and effluent goal exceedances for mercury. However, please note that the influent and effluent goals for the City's program cannot be updated unless the City conducts a reevaluation of the local limit based on the updated requirements and therefore the reevaluation becomes more important. For molybdenum, the corresponding influent and sludge exceedances suggest that the City's treatment plant is accepting too much of this pollutant. Since the City's currently approved local limits are about 15 years old, it is possible that they are not stringent enough to adequately control molybdenum discharges. Although the City's annual report indicates that it believes that the elevated levels of molybdenum are the result of cooling tower chemicals used in the summer months, there is no description of actions by the City to identify specific users within the system. One place to start would be to conduct sampling in the collection system to determine if higher levels of molybdenum are associated with confined locations within the system.

Measure 5 (NPDES violations) is listed in category 3 for ammonia based on the violation that occurred in May. The City's report indicates that there were no problems at the treatment plant associated with industrial discharges, but the report did not provide an explanation for the ammonia violation and therefore I could not assume that it was not related to industrial discharges. If the City can provide the cause(s) of the May ammonia violation and it is not related to industrial discharges this measure can be revised to category 2.

Measure 7 is listed in category 3 and measures 8 and 10 (SNC rates) are listed in category 2. The City's report indicates that it assessed and collected over \$150,000 in penalties for violations during the calendar year 2013 reporting period. While the user significant noncompliance rates have come down somewhat in the last several years, the City still needs to focus on its enforcement efforts since the percentage of significant industrial users in significant noncompliance for calendar year 2013 is still higher than the average for all approved POTWs in Pennsylvania.

Measure 13 (permit issuance) is listed in category 2 because two of the City's significant industrial user permits (Hofmann and Yuasa) expired during calendar year 2012 and still had not been reissued as of the date of the 2013 report. The City is required to reissue the user permits as they expire, and failure to do so would be considered a violation of the NPDES permit requirement to implement the pretreatment program.

Measure 15 (local limits) is listed in category 2. The City submitted a reevaluation of its local limits on May 5, 2006. I provided comments on that reevaluation on June 28, 2006 but the City never responded to those comments. Addressing those comments and finalizing the limits evaluation could address the influent and effluent exceedances for mercury discussed above and help ensure that the City's local limits are protective of the treatment plant and its discharges. Note that the City's NPDES permit that was reissued on November 25, 2013 requires submission of a new reevaluation of the local limits within one year of permit issuance (November 25, 2014). The permit also includes a requirement that the City submit a list of pollutants and sampling plan for the reevaluation within three months of permit issuance (February 25, 2014). To date I have not received the City's list of pollutants and sampling plan, and therefore the City



is in violation of its NPDES permit.

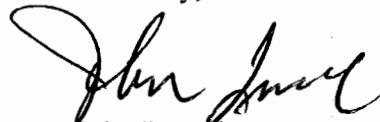
Measure 17 (streamlining) is listed in category 3. Although the City conducted an assessment of its current legal authority and determined that revisions are necessary to comply with the requirements of EPA's October 2005 amendments to the General Pretreatment Regulations, to date no revised ordinance has been submitted. The City must revise its ordinance quickly to ensure that it has sufficient authority to implement its pretreatment program as required. As suggested in the past, it is recommended that the City provide a draft of the ordinance revisions prior to adoption. Note that failure to update its approved pretreatment program to satisfy the requirements of the General Pretreatment Regulations is a violation of the City's NPDES permit. In addition, if the City is unable to implement required elements of its pretreatment program because it fails to update its legal authority, the failure to implement the program would be considered an additional violation of the City's NPDES permit.

Measure 18 (timeliness of responses) is listed in category 3. In addition to failing to respond to my comments on the City's 2006 local limits evaluation as noted above, the City has also not responded to my comments on its annual pretreatment reports for calendar year 2011 and 2012, and has not completely addressed the required actions from my pretreatment program audit conducted in 2005. For your use, I have enclosed a copy of the audit action items table showing my understanding of the actions taken by the City in response to the required actions from the audit. The City must provide a response to each of these issues. Items where the "Completion Date" column is blank are the unresolved issues.

Measure 19 (overall rating) is listed in category 3 with a rating of 66.7. This is lower than the City's rating for calendar year 2012 (71.9), and is well below the average rating received by POTWs in 2012 (87.7). Addressing the annual report, local limits, streamlining, and audit issues discussed above would help increase the City's rating relatively quickly, but to significantly improve the rating the City will need to address the significant noncompliance rates along with the influent and sludge exceedances.

Please provide a response to the issues raised above. If you have any questions regarding this matter, please contact me at 215-814-5790.

Sincerely,



John Lovell

Pretreatment Coordinator  
NPDES Permits and Enforcement (3WP41)  
Water Protection Division

Enclosures

cc: Maria Bebenek, PADEP Southcentral Region (w/out enclosures)  
Ron Furlan, PADEP Central Office (w/out enclosures)



## Reading Unpaid Penalties

**2008**

User	Date	Amount
Neversink Brewery	2/7/08	\$100
St Joseph Medical Center	2/7/08	\$500
Crescent Brass	9/2/08	\$342.03
Muhlenburg Foods	9/5/08	\$200
	12/10/08	\$600
Paragon Optical	9/16/08	\$1000

**2009**

User	Date	Amount
Termaco USA	2/20/09	\$100
	12/18/09	\$100
Reading Eagle Company	3/19/09	\$500
Remcon Plastics	3/19/09	\$100
Sealed Air Corp.	3/19/09	\$100
Sweet Streets Desserts	3/19/09	\$200
Aramark Uniform Services	3/24/09	\$800
Berks Packing	3/24/09	\$500
George Weston Bakeries	3/24/09	\$200
IFS Industries	3/24/09	\$350
National/Yorgey's Cleaners	3/24/09	\$400
	8/24/09	\$400

**2010**

User	Date	Amount
National/Yorgey's Cleaners	2/26/10	\$250
	6/8/10	\$500
Neversink Brewery	2/24/10	\$100
Paragon Optical	3/8/10	\$450
	6/8/10	\$200
	9/15/10	\$100
	12/28/10	\$200

**2011**

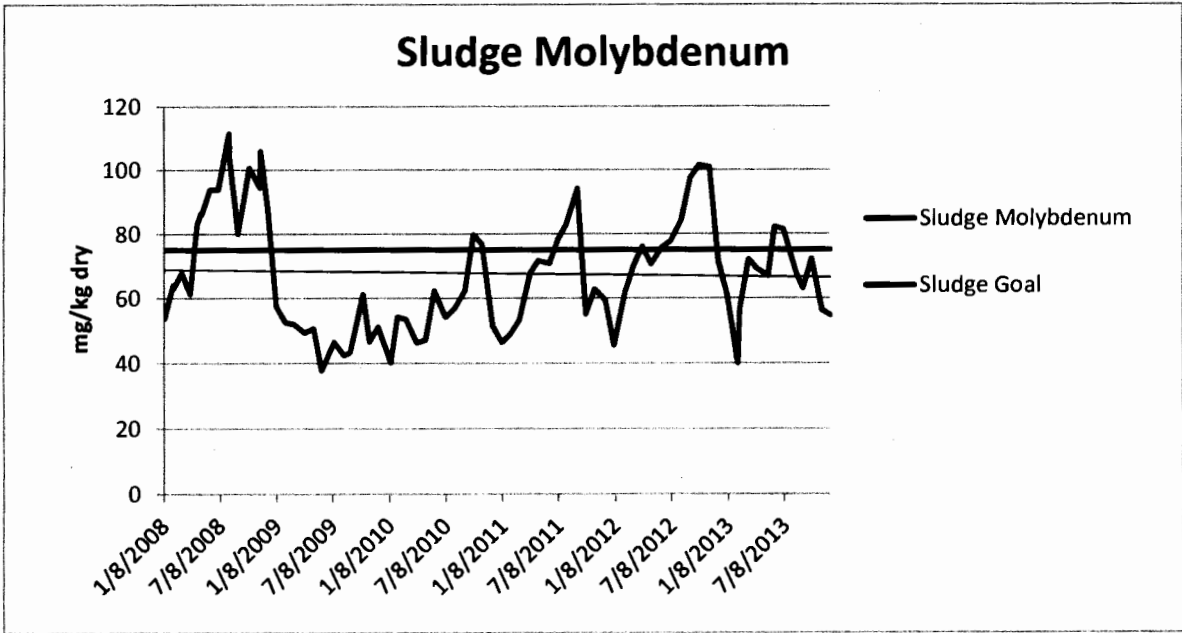
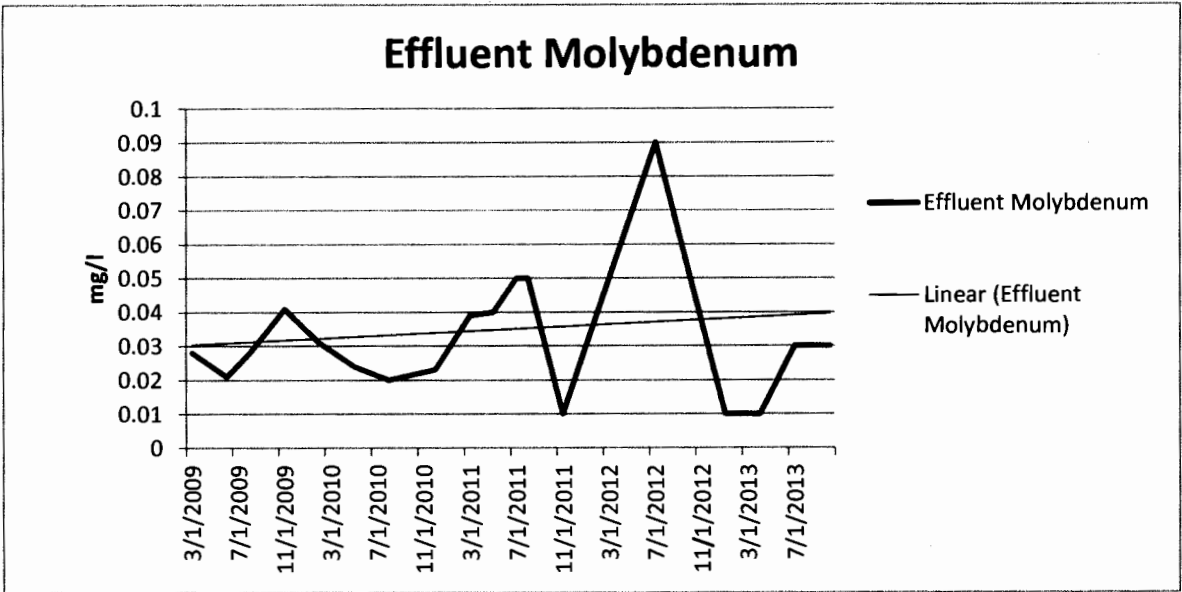
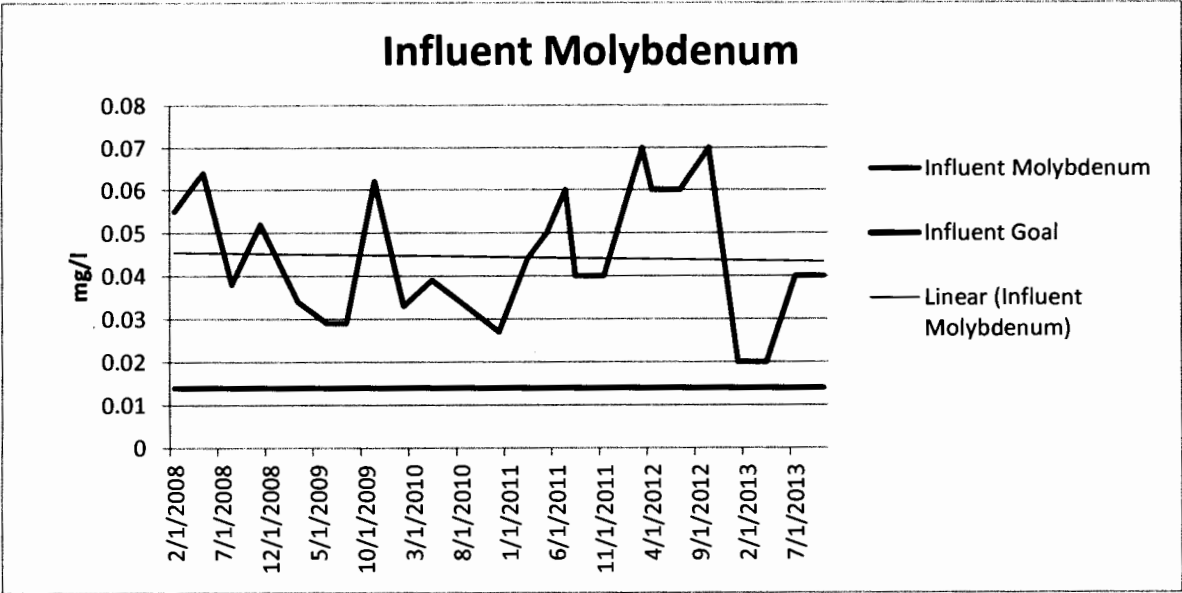
User	Date	Amount
Carpenter Corporation	1/5/11	\$200
Exide Corporation	1/5/11	\$100
	3/7/11	\$1000
Crescent Brass	3/4/11	\$1550 (\$550 paid)
Hoffman Industries	6/20/11	\$200
Paragon Optical	6/16/11	\$100
	9/27/11	\$100
Van Bennett	9/21/11	\$100
	12/29/11	\$100
Termaco USA	12/29/11	\$1000 (\$900 paid)

**2012**

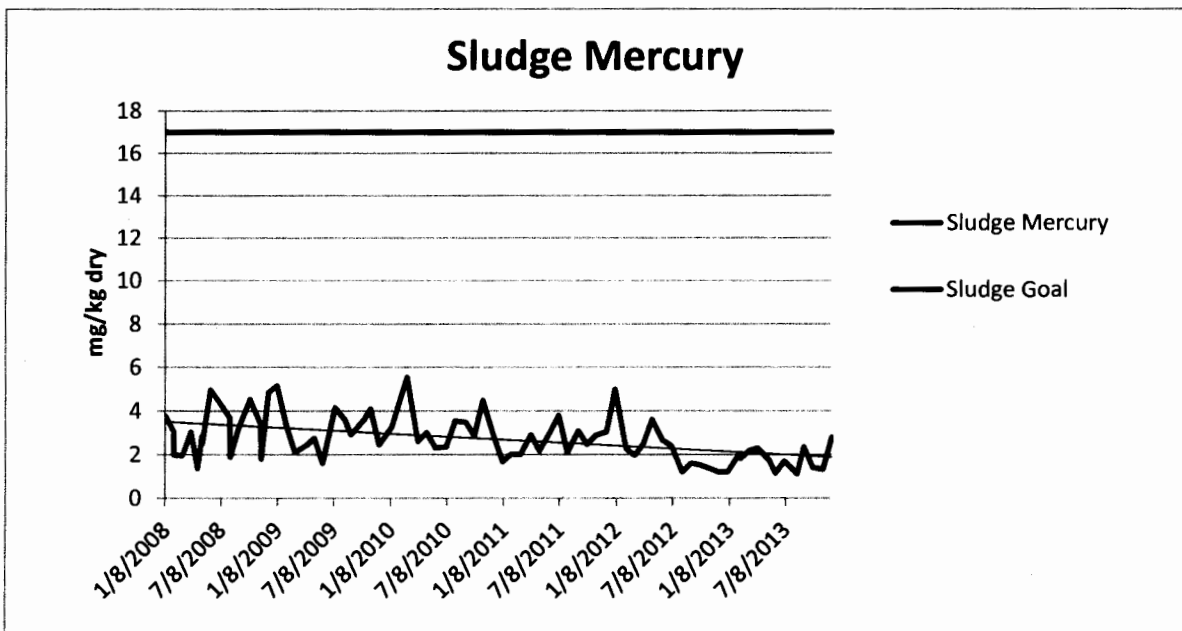
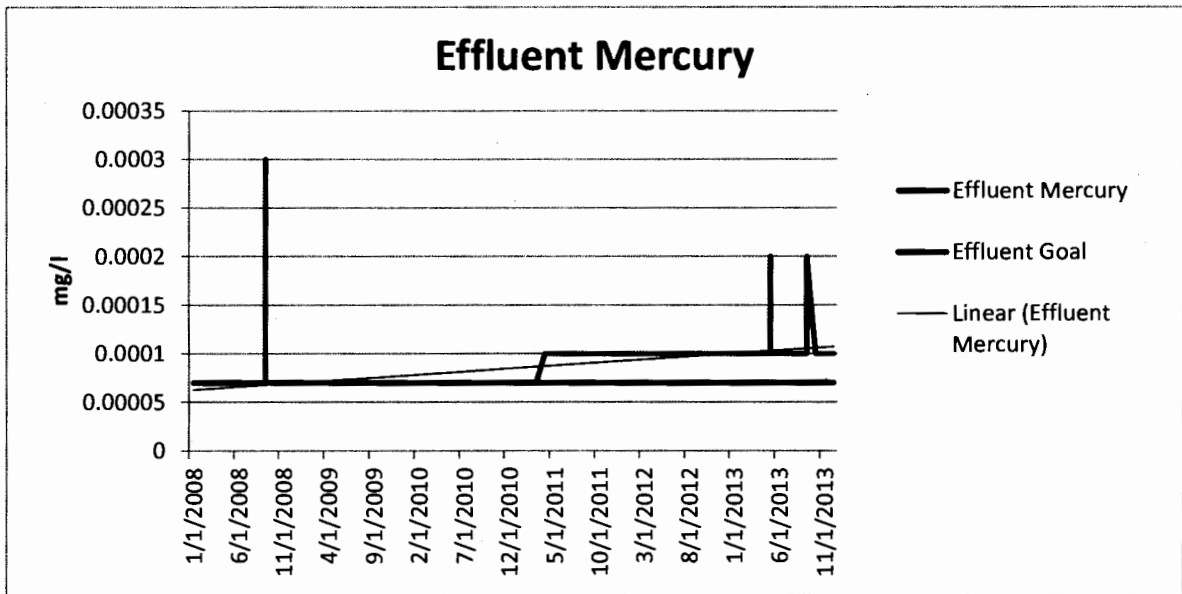
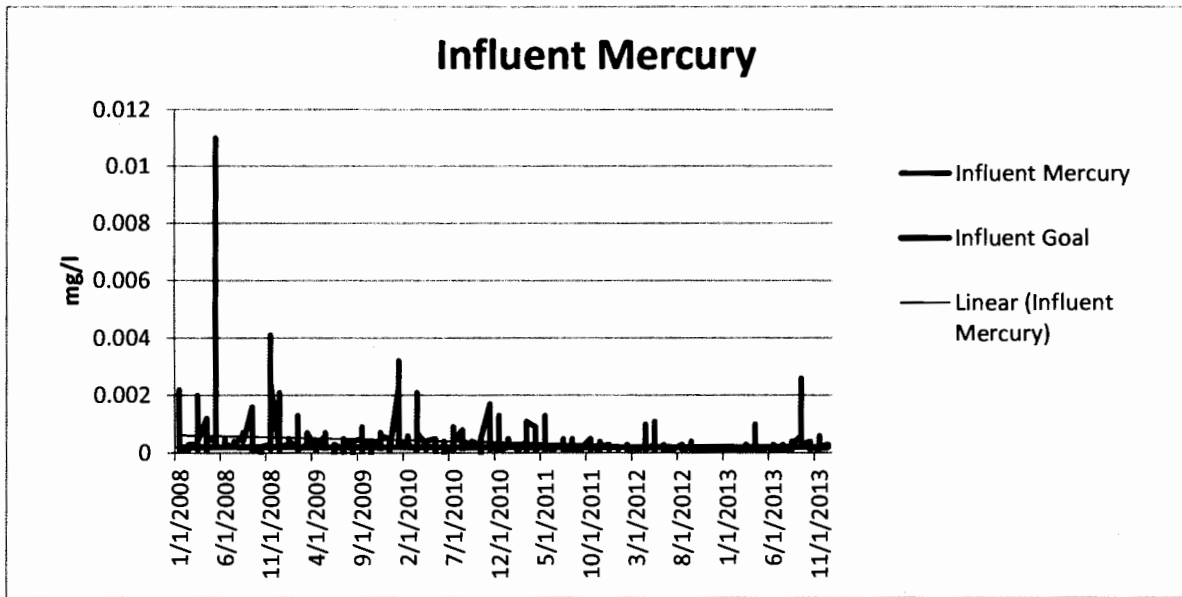
User	Date	Amount
Paragon Optical	1/4/12	\$600
	4/12/12	\$100
Crescent Brass Manufacturing	4/13/12	\$265.05
Robeson Township	10/22/12	\$2991.85

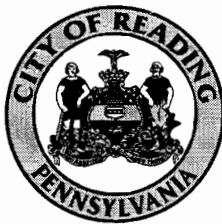
**2013**

User	Date	Amount
Paragon Optical	5/1/13	\$2000
Reading Truck Body	5/30/13	\$100
Crescent Brass Manufacturing	9/30/13	\$265.05
Carpenter Corporation	12/19/13	\$1600
Van Bennett	12/19/13	\$50









# CITY OF READING, PENNSYLVANIA

PUBLIC WORKS  
503 N. 6<sup>TH</sup> STREET  
READING, PA 19601  
(610) 655-6121

**DEBORAH A. S. HOAG**  
**UTILITIES DIVISION MANGER**

March 28, 2014

Mr. John Lovell (3WP41)  
Office of Municipal Assistance  
US Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia PA 19103-2029

Dear Mr. Lovell:

As required by the City of Reading's NPDES Permit Number PA0026549, the City is to submit an annual report covering developments of the City's Pretreatment Program. Enclosed please find the annual report covering the period of January 1, 2013 to December 31, 2013.

Please do not hesitate to contact me at 610-655-6121 should you have any questions on the report.

Thank you for your attention.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah A. S. Hoag".

Deborah A. S. Hoag, PE  
Utilities Division Manger

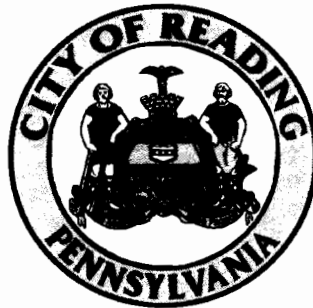
DASH/ts  
Enclosure

C: Ralph Johnson, P.E., Acting Director of Public Works  
Jeffrey Hill, Environmental Program Coordinator  
File



**CITY OF READING**

**ANNUAL PRETREATMENT  
REPORT**



**REPORTING YEAR 2013**

## PRETREATMENT PERFORMANCE SUMMARY

### I. General Information

Control Authority Name: City of Reading WWTP  
Address: 815 Washington Street  
City : Reading State : PA Zip : 19601-3690  
Contact Person: Deborah A.S. Hoag, P.E.  
Contact Title: Utilities Division Manager  
Contact Telephone Number: (610) 655-6121  
E-mail address: Deborah.Hoag@readingpa.org  
NPDES Nos: PA 0026549  
Permit Issuance Date: 12/01/13 Expiration Date: 11/30/18  
Reporting Period: 1/1/13 to 12/31/13  
Total Categorical IUs (CIUs): 10  
Total "Middle Tier" CIUs (MTCIUs): 0  
Total Nonsignificant CIUs (NSCIUs): 0  
Total Significant Noncategorical IUs (SNIUs): 26

### II. Compliance Monitoring Program

1. No. of SIUs with Current Control Documents.....36
2. No. of SIU Facilities Inspected..... 36
3. No. of SIU Facilities Sampled..... 36
4. No. of SIUs Submitting Self-Monitoring Reports..... 36

### III. Significant Industrial User Compliance

1. No. of SIUs Violating a Compliance Schedule/No. On a Schedule..... 0/0
2. No. of SIUs in SNC for the July to December Period..... 1
3. No. of SIUs in SNC At Any Time During Calendar Year..... 8
4. No. of SIUs in SNC That Were Also in SNC During The Previous  
Calendar Year.....2
5. No. of NSCIUs that violated any standards or requirements..... N/A

### IV. Enforcement Actions

1. Notices/Letters of Violation Issued to SIUs..... 107
2. Enforcable Compliance Schedules Issued to SIUs..... 0
3. Civil/Criminal Suits Filed.....0
4. No. of SIUs from which Penalties have been Collected.....22
5. Other Actions (sewer bans, etc.)..... 0

I certify that the information contained in this report and attachments is complete and accurate to the best of my knowledge. (See Part B.V of the instructions)

Deborah A. S. Hoag, P.E.  
Name of Authorized Representative

  
Signature

Utilities Division Manager  
Title (Print)

03/28/2014  
Date

## **Pretreatment Annual Report**

### **Part A – Pretreatment Performance Summary**

#### **I – General Information**

##### **Significant Users**

At the end of the reporting period, the City of Reading had 36 significant industrial users, classifying 10 as categorical users and 26 as non-categorical users. Last year the City reported the same number of categorical and non-categorical users. All 36 of the users have current permits.

Aramark Uniform Services was issued a new permit with no changes made.

A permit was issued for Berks Packing Company. The permit requirement of monthly sampling for oil and grease remained unchanged in this permit. Also remaining unchanged is the requirement that 2 resamples be taken within 30 days of any oil and grease violation. If an oil and grease resample is also in violation, additional samples must be taken until 2 consecutive tests are within the permit limit.

A new permit was written for Carpenter Technology Corporation. New categorical limits were issued for outfall 001. No changes were made to sampling requirements for outfalls 002 or 003. A new outfall, outfall 004, was included on the permit. This new outfall was necessary to test the waste water from a new jet cutting operation which the company installed and put into service in 2013.

A new permit was issued to Car Wash Partners dba Mister Car Wash. The business, previously known as Cloister Car Wash was sold in 2013. No changes were made to testing requirements in this permit.

A new permit was issued to Clover Farms Dairy. No changes were made to sampling and testing requirements. It was noted that Clover Farms is building an addition onto their pretreatment facility. The permit states that the company shall notify the City when the new equipment is put into service. The City will issue an amended permit which will describe the new treatment process and the new sampling point when upgrades have been completed.

A new permit was issued to CRYOVAC Food Packaging Division, Sealed Air Corporation with no changes made.

A new permit was issued for Exide Technologies. The company traditionally was issued separate permits for the three plants that discharge wastewater to the City of Reading. For compliance monitoring (inspections, sampling and self-monitoring) and enforcement counts and spreadsheets, each plant is counted separately. The plants are physically separated but are all located within the boundaries of the Exide Technologies complex. Although ownership is the same, management and authorized representatives were different for these plants. This changed in 2011 and now there is one Plant Manager for the entire complex. In addition, authorized representatives for the Pretreatment Program are now the same for all plants. Significant

developments at this company have occurred over the past two years. Plant One and Two essentially closed in 2010. Plant One was a battery charging operation. The discharge from the building was and continues to be sanitary only. Since the closure, there is minimal usage of the building facilities. The majority of the building along with the major employee facilities is shut down and not accessible. Plant Two was a distribution center. It is now used for offices and also for the locker and shower rooms for all employees. The discharge was and continues to be sanitary only. Shower water and many of the sinks discharge to the company's treatment plant and not to the City. The discharge from Reading Recycling was terminated in September 2011. This discharge also was sanitary only. All bathroom facilities have been removed from this building and there is now no discharge to the sampling point. Due to these changes, the new permit just issued will cover all three Exide Technology buildings. The permit stipulates that, should Exide or another company restart manufacturing at the facility, the company shall notify the City a minimum of 90 days before the scheduled restart.

Interstate Container was issued a new permit with no changes made.

A new permit was issued for Lentz Milling. Previous permits required self monitoring testing for all parameters every other year. This permit requires sampling of all parameters every year. All other quarterly testing requirements remain the same.

A new permit was issued for Quadrant EPP USA Inc with no changes made.

Quaker Maid Meats Inc was issued a new permit with no changes made.

Reading Truck Body was issued a new permit. New categorical limits were issued based on production information the company supplied in their self monitoring reports. The combined wastestream formula was not required to be used in determining the new limits.

A new permit was issued for Reitech Corporation with no changes made.

St. Joseph Medical Center Downtown was issued a new permit with no changes made. The company had requested a change in the requirement that an oil and grease sample be taken monthly at outfall 005. Due to past issues with this parameter at this outfall, it was determined that the monthly oil and grease sampling requirement should remain for at least one more permit cycle.

A new permit was issued for Sealed Air Corporation. Discharge limits on tri- and pentachlorophenol were update based on production information supplied by the company. No other changes were made.

A permit was issued for Sun Rich Foods with no changes made.

A new permit was issued to Sweet Street Desserts Inc. No changes were made to the testing requirements. It was noted that the company made a slight change to its method of solids disposal. Previously, sludge from the treatment process had been dewatered using diatomaceous earth and a rotating drum filter at the company's pretreatment plant. The sludge was then

removed for disposal by a licensed disposal company. Starting in 2013, Sweet Street stores the liquid sludge that had been filtered onsite in a tank inside their treatment facilities. The sludge is removed by a disposal company and used in that company's digester.

A new permit was issued for United Corrstack. New limits were issued in the permit for tri- and pentachlorophenol based on production information supplied by the company.

#### Non-Significant Users

The City also has 12 users classified as non-significant due to their minor flows and/or the low probability of potential problems. One non-significant user, Paragon Optical, has not renewed their discharge permit. The City received an incomplete permit application from Paragon Optical just before their permit expired in December 2012. There was no renewal fee or results from required testing attached to the application. Subsequent phone calls went unreturned. Mail was returned as undeliverable. During unannounced visits to the company in April and May, it was discovered that all doors to the facility were locked and the building appeared to be abandoned. Paragon Optical filed for bankruptcy protection in May 2013.

A new permit was issued to Akzo Nobel Inc R&D Center. The name of the company was changed from Rohm & Haas after the completion of the sale of the company. No changes to testing requirements were made.

A new permit was written for Ultra Wash of Philadelphia, Inc with no changes made.

A new permit was issued for Unique Pretzel Bakery. The sampling point was changed in the new permit to reflect the changes the company made by adding a tank from which to sample. Also, the company was required to do biannual testing in the first half of 2014 and 2015 due to the late date the permit was written and sent. No other changes were made to this permit.

A new permit was issued for Van Bennett Foods. The company was bought in late 2012 but the name remained the same. However, management personnel are changed on the permit. The company is required to do biannual testing in July 2013 and July 2015. No other changes were made to this permit.

WORLD electronics was issued a new permit. No changes were made.

The current list of industrial users with their addresses is attached as **Appendix 1**.

## **II – Compliance Monitoring Program**

**Appendix 2** provides a listing with issuance and expiration dates for all significant and non-significant user control documents along with the number of inspections, sampling visits and self-monitoring events required and conducted during the year. The City uses permits for its control mechanism for significant and non-significant users. All 36 significant industrial users have current control documents. All permits are individual. No general control mechanisms (permits) are used. For CIUs, the City has not assigned mass based limits in place of concentration based categorical limits. For CIUS, the City has not assigned concentration based

limits in place of mass based categorical limits. The City has not granted a monitoring waiver for any CIU for any categorically regulated pollutants in accordance with 40 CFR 403.12(e)(2). All 36 significant industrial users were inspected during the year. The City requires self-monitoring for all of its significant industrial users. For one industrial user, Orograin Manufacturing Bakeries, the City performs all of the testing for one parameter only. The City performs all testing for color in its own laboratory. The industry is required to do self-monitoring for all other parameters. This decision was based on the results of a split sample study performed in 2007. The City understands that any violation for color in its testing requires a resampling within 30 days in accordance with the Pretreatment Regulations.

Beginning with permits issued effective April 1, 2010, other items in the June 28, 2006 letter addressing the last EPA audit of the City's Pretreatment Program were also addressed. These permits include a limit for free cyanide. A number of these permits do not require testing for free cyanide. This determination was made based on a data review, facility inspections and documents from the company demonstrating that there is no reasonable potential for violation of the local limit for free cyanide and is documented in each permit. However, testing for free cyanide was added to some of the permits as described in the Notes section of the Increased Industrial Sampling spreadsheet in **Appendix 3**. If self-monitoring for any other local limits pollutants is not required twice a year in these permits, documentation based on a data review and facility inspections is included in each permit demonstrating that there is no reasonable potential for violation of the local limit for these particular pollutants. These permits contain an explanation for the number of grab samples required for those pollutants that require sampling in this manner. They also contain an explanation for the requirement for sampling in certain months of the year.

Beginning with permits issued effective April 1, 2010, the following permit conditions are included as sent to the EPA in April 2010:

**D. Other Permit Conditions**

The permittee shall notify the City immediately of any changes at the facility affecting the potential for a slug discharge. A slug discharge is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass-through, or in any other way violate the POTW's (publicly owned treatment works) regulations, local limits or permit conditions.

The Permittee shall maintain or provide documentation demonstrating compliance with the best management practices listed below.

- A Spill Prevention and Control Plan (Accidental Discharge/Slug Control Plan) that has been submitted to the City for approval must be maintained and implemented by the Permittee. A plan entitled \_\_\_\_\_, dated \_\_\_\_\_ and signed \_\_\_\_\_ was submitted to the City for approval. The Permittee is required to maintain and implement this plan at its facility.

All 36 significant industrial users were inspected and sampled by the City during the year. City sampling of significant users varies from monthly to annually. Exide Technologies – Plant One was sampled on a quarterly basis by the City. The City discontinued testing in the second half of



2010. Production in this building ceased on June 7, 2010 followed by cleanup of the production areas. The company continued sampling as required by permit. The discharge from the building is sanitary only. The closure resulted in minimal usage of the building facilities. The majority of the building along with the major employee facilities are shut down and not accessible. Exide Technologies – Reading Recycling was sampled to verify that there is no discharge.

Significant users are required to submit self-monitoring reports at varying frequencies but not less than twice per year. All significant industrial users submitted all required self-monitoring reports during the year. The following industries were cited for submitting late reports: Clover Farms Dairy, International Foundry Supply, Orograin Bakery, Prizer Painter Stove Works, and Savor Street Foods (formerly Bachman Pretzels). Lentz Milling was cited for late sampling. Five industries were cited for failure to report violations: Carpenter Technology Corporation. Clover Farms Dairy, Crescent Brass Manufacturing (two citations for failure to report violations), Orograin Bakery, and Sweet Street Desserts. Carpenter Technology Corporation and Orograin Bakery were cited for failure to resample. All of the companies that were cited for either failure to report and/or failure to resample except Clover Farms and Sweet Street were in SNC for some portion of 2013 for the above reasons plus the violations themselves.

During the year, the City conducted sampling in excess of the proposed amount at a number of facilities to assess compliance after violations. A number of facilities conducted self-monitoring above the required amount for the same reason. These events were done at the facility's initiative or voluntarily following the City's request. The Increased Industrial Sampling spreadsheet shows details of this and is included in **Appendix 3**. The number of additional sampling events on this spreadsheet does not always correspond with the Compliance Monitoring spreadsheet in Appendix 2 that covers all sampling events for the year. This is because City sampling events for issues other than compliance (additional sampling for conventional pollutants for surcharge billing) are not included in the Increased Industrial Sampling spreadsheet. In some cases, the City or the industry tested for additional parameters during a required or scheduled sampling event. In this case, the additional sampling performed column has been left blank and only the tests are listed. Required industrial resamples following violations are not included on any of the spreadsheets. Separate spreadsheets are included for significant industrial users and non-significant industrial users. The Increased Industrial Sampling spreadsheet also includes a Notes section. In this section, formal changes in sampling frequency are described. These are instances where the industrial user's permit or the City's SOP for an industrial user was changed to increase the frequency of testing for a parameter of concern.

While not required to report on non-significant industrial users, the City has always included this information in the Annual Report. All non-significant industrial users were sampled by the City during the year, except Ultra Wash of Philadelphia. Ultra Wash of Philadelphia is permitted for possible batch discharge only and therefore monitoring by the City is not planned. City sampling of non-significant users varies from quarterly to annually with the exception of Ultra Wash of Philadelphia.

Non-significant users are required to submit self-monitoring reports at varying frequencies but not less than once a year. Ultra Wash of Philadelphia is required to report quarterly on whether there has been a discharge to the sewer system. All non-significant industrial users submitted all

required self-monitoring reports during the year. Ultra Wash of Philadelphia was cited for a late report. The 1<sup>st</sup> quarter self monitoring report was submitted after the due date. Van Bennett Foods was cited for three late reports and two failures to resample. Van Bennett was in SNC due to the failures to resample as well as the high test results. They were not in SNC as of the end of the year.

One non-significant industrial user was cited for Failure to Report as well as three TRC metals violations. The user in non-compliance is Paragon Optical Company. The company did not submit any self monitoring reports in 2013. Repeated phone calls to the company were not returned. All mail has been returned as undeliverable. Two unannounced trips to the facility have shown all doors locked and the facility apparently abandoned. Water to the facility has been shut off by the local water authority. In May 2013, the company filed for bankruptcy protection. The company was in SNC during the year 2013 and remains so as of December 31, 2013.

### **III – Significant Industrial User Compliance**

#### Compliance Schedules

There are no significant users on a formal compliance schedule as of the end of 2012.

#### List of significant users in SNC anytime in 2012

An explanation of the individual facilities, both significant and non-significant, in SNC during the reporting year follows below. The number of SIUs in SNC at any time during the calendar year was 8. The number of SIUs in SNC for the July to December Period (fourth quarter) was 1. 6 of the 8 SIUs that were in SNC during the calendar year were in SNC for one quarter only. 3 of these 8 SIUs was in SNC for Failure to Report. 2 other SIUs were in SNC for more than one quarter. One of these companies has already taken measures to solve their non-compliance issues. The other has no explanation for the violations. The one that has taken steps to resolve the problem changed the filter and cleaned out the device that was supposed to filter the element that caused the violation out of their wastewater. Subsequent tests have revealed that they have returned to compliance.

The table below summarizes SNC by quarter. The first column shows the number of SIUs in SNC for the quarter. The second column shows the number of SIUs that were also in SNC for the previous quarter. The third column shows the number of new SIUs in SNC (not in SNC in the previous quarter). The fourth column shows the number of SIUs that were in SNC in the previous quarter but were not in SNC for the current quarter (returned to compliance or inconsistent noncompliance).

2013	SNC	SIUs in Repeat SNC	New SIU in SNC	SIUs that Returned to Compliance
1 <sup>st</sup> quarter	2	1	1	2
2 <sup>nd</sup> quarter	2	0	2	2
3 <sup>rd</sup> quarter	5	2	3	0
4 <sup>th</sup> quarter	1	0	1	5

The table below shows the compliance status of the SIUs by quarter for the 2013 year. The number of SIUs in the first column had no violations for the quarter. The number of SIUs in the second column had violations that did not result in SNC. The number of SIUs in the third column had violations resulting in SNC.

2013	Compliance	Inconsistent Noncompliance	SNC
1 <sup>st</sup> quarter	25	9	2
2 <sup>nd</sup> quarter	22	12	2
3 <sup>rd</sup> quarter	19	12	5
4 <sup>th</sup> quarter	24	11	1

These facilities are the *significant users* that were in SNC for the year.

Carpenter Technology Corporation

Nature of violation:

3<sup>rd</sup> Quarter -TRC and chronic violation of the chromium limit listed in its permit

3<sup>rd</sup> Quarter - Failure to report violation

3<sup>rd</sup> Quarter - Failure to resample

Actions planned and current compliance status:

During normal self monitoring sampling in August, the company had a chromium test which was in violation of its permit limit. The company reported the violation prior to filing its third quarter self monitoring report, but several weeks after the sample had been taken and the results of the test available to company personnel. The company also failed to resample as written in its permit. Through extra sampling by both the company and the City, the company returned to compliance.

Crescent Brass Manufacturing Company

Nature of violation:

2<sup>nd</sup> Quarter - TRC and chronic violation of the copper limit in its permit and failure to report violation

3<sup>rd</sup> Quarter - TRC violation of the copper limit in its permit

Actions planned and current compliance status:

The company reported a copper violation on a sample taken in May. The violation was reported on the company's second quarter self monitoring report. Another copper sample was taken within the 30 day time period for resampling as is written in the company's permit. This sample was also in violation of the copper permit limits. A third sample was taken, the results of which were within permit limits. No explanation was given for the high copper in any of the samples. The City took extra samples in the third quarter, but the company remained in SNC at that time due to a violation in September. As of the fourth quarter of 2013 the company has returned to compliance.

Hofmann Industries, Inc.

12012

Nature of violation:

1<sup>st</sup> Quarter-TRC violation of the zinc limit listed in its permit

1<sup>st</sup> Quarter-TRC and chronic violation of the maximum monthly average limit listed in its permit

Actions planned and current compliance status:

This is a categorical industrial user and therefore has a maximum monthly average limit for a number of parameters including zinc. There is a pretreatment system in operation. The company reported a leak in a caustic tank was the cause of violations in October and November 2012. However, there was an additional violation in January 2013. Extra sampling was done in March by both the company and the City, which yielded some more violations. Subsequent testing through the year produced no further violations and the company has returned to compliance.

Interstate Container LLC

Nature of violations:

3<sup>rd</sup> Quarter - TRC and chronic violation of the color level listed in its permit

Actions planned and current compliance status:

There were two Self Monitoring test results and five City color test results out of fourteen total color samples taken during the third quarter in violation of the company's permit limits. The company indicated that a recirculating valve was removed from their discharge pipe during the time they were getting their filter press repiped. Company personnel state that the bypass was necessary because the discharge is a batch discharge and sediment remains in the filter press screens after the screens have been cleaned between pressings. Water is recirculated back into the treatment tank for the first minute or so of any batch discharge. The valve was replaced. The company had some color violations in the ensuing months but much fewer than prior to the valve being replaced. The company has returned to compliance.

Orograin Manufacturing Bakeries

Nature of violation:

1<sup>st</sup> Quarter - TRC violation of the oil and grease limit listed in its permit

TRC and chronic violation of the lead level listed in its permit

Failure to resample

Failure to report violation

Actions planned and current compliance status:

During a test in January 2013 done by the City, there was a lead violation. The company believes that an outside contractor who had been cleaning and servicing and changing batteries on their tow motors may have caused some lead from the batteries to be on the floor and the lead was washed into a nearby sump pit which discharges to the outfall with the violation by company personnel. Changes were made to the battery changing and floor washing routines to try to prevent this occurrence from happening again. Also, the company had an oil and grease (HEM) violation on a self monitoring sample taken in February. This violation was only reported to the City when the company's first quarter self monitoring report was submitted in April, not within 24 hours of learning of the violation as required in the industrial wastewater permit. Additionally, the company did not take an oil and grease resample as required in their permit. Company and City representative met to explain the violations and try to come up with ways to avoid future violations. The company has not had any other violations and has returned to compliance.

Quaker Maid Meats, Inc

Nature of violation:

4<sup>th</sup> Quarter - TRC violation of the oil and grease (HEM) listed in its permit

Actions planned and current compliance status:

During normal self monitoring testing in October, the company had an oil and grease violation. A retest a week later also showed a violation. A second retest taken three weeks later had a result that was below the permit limit. The second high result placed the company in SNC for the fourth quarter. A company representative e mailed that the company had begun to clean its fryers on a more frequent basis and he believed that was the reason for the violations. The company increased the rate at which their oil separators are pumped out and had a good test

subsequent to the increased pumping schedule. Nevertheless, the company remains in SNC as of the end of 2013.

Reading Plating and Polishing Works, Inc.

Nature of violation:

3<sup>rd</sup> Quarter - TRC violation of the oil and grease (SGT-HEM) level listed in its permit

Actions planned and current compliance status:

The company had two oil and grease (SGT-HEM) violations; one in August and the other in September. Neither company nor City personnel have been able to find a reasonable explanation for these violations. Both the company and the City took extra samples. There were no additional violations. The company has returned to compliance.

St. Joseph Medical Center-Downtown

Nature of violation:

2<sup>nd</sup> Quarter - TRC and chronic violations of the mercury level listed in its permit

3<sup>rd</sup> Quarter - TRC and chronic violations of the mercury level listed in its permit

Actions planned and current compliance status:

A mercury sample was taken in May during normal City testing. This test showed a violation for mercury. Two additional samples were taken in June by the City. Both of these results were also in violation. The company has a device that is supposed to filter out fillings from the dental clinic which is probably the source for mercury at this outfall. The filter was changed and the device cleaned and serviced after these violations. A sample taken in September showed results below the permit limit. As this sample was the only sample taken after June, the company returned to compliance in the fourth quarter of 2013.

The following facilities are *non-significant users* that were in SNC for the year.

Paragon Optical Company

Nature of violations:

2<sup>nd</sup> Quarter - TRC violation of copper, lead, and zinc levels listed in its permit

3<sup>rd</sup> Quarter - TRC violation of copper, lead, and zinc levels listed in its permit

All Quarters-Failure to report

Actions planned and current compliance status:

The company has not submitted a self monitoring report since the second quarter of 2012. Tests taken by the City in April showed violations of copper, lead, and zinc. No subsequent tests were taken. Phone calls and unannounced site visits were unanswered. All bills and other correspondence sent since the second quarter of 2013 have been returned as undeliverable. Water to the company was shut off by the Reading Area Water Authority in 2013. In May 2013, the company filed for bankruptcy protection.

Van Bennett Food Company, Inc

Nature of violation:

1<sup>st</sup> Quarter - Failure to resample

Actions planned and current compliance status:

The company reported a pH and oil and grease (HEM) violation on their 1<sup>st</sup> quarter self monitoring report. The report was filed in a timely manner, however, the company did not

resample either of the parameters as required on their permit. The company began separating high oil and grease waste in containers and having it shipped out rather than washing it down drains. There was an oil and grease violation in June, but the company has returned to compliance.

#### Repeat SNC from the Prior Year

Industrial Users that were in SNC for this reporting year that were also in SNC for the previous reporting period are found in **Appendix 4**. This appendix also lists the parameter or reason for the industrial user being in SNC for both years. There were two industries that were in SNC last year that did not return to compliance by the end of 2013. One was Quaker Maid Meats. The company had an oil and grease violation during normal self monitoring testing in October. A retest one week later showed another violation. All tests since that second violation have been in compliance, but the company was in SNC as of the end of 2013. Due to the changes the company made after the violations, it is probable that the company will be found to have returned to compliance after the first quarter of 2014. The other industry is Paragon Optical Company which was in SNC due to three metals violations in City testing as well as failure to report. The circumstances surrounding this industry are described in greater detail in **Appendix 4**.

#### Newspaper Listing

The significant users in significant non-compliance at any time during the reporting year are found in the newspaper listing attached as **Appendix 5**. The City used the rolling six-month time frame as required by 40 CFR 403.8 (f)(2)(viii) and reported all significant violators on a quarterly basis.

### **IV – Enforcement Actions**

**Appendix 6** provides a list of the following for both significant and non-significant industrial users:

Notices of violation

Number and nature of violations

Compliance orders

Total penalties assessed in 2012 and the reasons for the penalties

The City issued 124 Notices of Violation for 2013. This is an increase from 2012. Also, only 23 SIUs received NOVs for 2013. It is attributed to working informally but aggressively with industries having compliance issues in order to seek solutions prior to the necessity of a Consent Agreement. Another major factor is the City's Penalty Escalation Policy. Under this program, the penalty is escalated after two consecutive quarters with one or more TRC violations for the same parameter. The penalty escalates again after two more consecutive quarters with one or more TRC violations for the same parameter. If there is a quarter without a violation, the penalty remains at the same level for the next two quarters. The penalty returns to the base amount after four consecutive quarters without a violation for the parameter in question. Although there are some industries that are still having penalties escalated, others have been able to return to the base amount through continued compliance. The penalty escalation program has also been a positive factor in working with industries to enter into a Consent Agreement. The penalty escalation program has been in effect since 2003.

All SIUs that had violations were subject to enforcement action by the City. All NOV's issued to SIUs by the City were followed with an administrative penalty during the next billing cycle. The initial penalty schedule is found in **Appendix 6**. A number of facilities have had penalties escalated due to recurring violations for the same parameter which is also detailed therein.

#### Compliance Schedules

There were no compliance schedules issued in 2013. A Consent Order or Consent Agreement (COA) may be written for Clover Farms Dairy. The City intends to proceed cautiously in the decision to write such a document and secure EPA review and input of the draft COA prior to any discussion or presentation of the document to the company. The City does not intend to include any reduction in fines in a new COA. The City does intend to require pH adjustment, a new sampling point (sampling manhole) and flow metering of the discharge. The company and its lawyer appear to want the City's approval or consent to abandon plans for a DAF system in favor of the installation of skimmers to control oil and grease. The City is interested in consistent compliance at all times and representative sampling and the method of achieving this is the responsibility of the company. The company is proceeding with construction on improvements on its pretreatment system. Construction has not been completed at this time. Penalties on oil and grease violations were increased to \$4000 per occurrence in the second quarter of 2013.

There are no significant users on compliance schedules that are in writing but are not considered "formal".

23 significant users were assessed penalties related to sampling in 2013. Penalties were collected from 22 of the users in 2013. The number of users paying penalties in 2013 does not correspond to those receiving penalties as a result of the third and fourth quarter 2012 penalties that were issued and paid in 2013. Some industries had violations for 2012 but not in 2013. Penalties are included in the quarterly industrial waste surcharge bills. Conversely, the City received payments in 2013 for violations occurring and assessed in 2012. Of the SIUs receiving a penalty, 20 paid in 2013 while the fourth quarter 2013 invoices with fines were not sent out until 2014. Two users with late 2012 violations paid their fines in early 2013. A report on the penalty payment status for violations occurring during 2013 is included in **Appendix 7**. Please note that Crescent Brass appears periodically throughout the report. They are required to pay \$265.05 monthly for prior years' delinquent fines as a settlement in their bankruptcy. These payments are processed by the Law Department and postings often include multiple months.

The City has been and will continue to investigate errors in the penalty payment and posting. There are some minor payment discrepancies requiring additional research with the Administrative Services Department. Public Works staff has discovered errors with the posting of prior penalties' payments within the software system as well as subsequent corrections such as the incorrect account number used so the payment is improperly shown in the penalties reports or not reflected in the reports. Research in this system shows that the corrections appear in some individual customer queries but not in the summary reports. This system's data is also transferred to the City's accounting system so the error correction process is critical. The City has working interdepartmentally to resolve this issue for the past and determine how to make corrections be reflected in both the accounting and tracking systems with accurate tracking and



reporting in all systems as the goal. Creating a general awareness of the problem and its impact has worked to reduce the need for corrections in the systems.

## **Part B – Pretreatment Developments**

### **I – Summary of POTW Operations**

Over the past year, the City has not experienced process upsets, NPDES permit violations, pass-through events or interferences that could be attributed to industrial waste. Additionally, the City did not have problems in the collection system that could be attributed to industrial waste.

The ongoing improvements in management, operations and maintenance (MOM) practices during the year continue to make the pump stations and wastewater treatment plant (WWTP) more effective, efficient and reliable.

The City is required to perform priority pollutant testing annually. The priority pollutant sampling along with the quarterly local limits testing was conducted on the following dates: 1/29-30/13 for the influent, 1/29-30/13 for the effluent and 2/5/13 for the biosolids. The results of these analyses are included in **Appendix 8**. The Form 43 biosolids sampling was conducted on 2/5/13 and 8/13/13. The City is required to perform local limits testing on the influent, effluent, and biosolids on a quarterly basis per the City's NPDES permit. Four tests were performed for the influent and effluent as reported in the in the Monitoring Data Spreadsheet. Weekly mercury testing is performed on plant influent points and the plant effluent. The results of these analyses are included in **Appendix 8**. Priority pollutant testing, quarterly local limits testing and mercury testing is also performed at two of the major influent points for the plant prior to the commingling of all wastewater at what is designated as the plant influent. These two major influent points are designated as 6<sup>th</sup> and Canal (6<sup>th</sup>) and the Grit Chamber (Grit). Results for these two major influent points are included in **Appendix 8** and also in the Monitoring Data Spreadsheet.

For biosolids, monthly 503 analyses were performed in 2013. Monthly fecal coliform testing on biosolids was not done in 2013. These are included in **Appendix 8**.

Influent, effluent and biosolids data from the quarterly testing and priority pollutants testing and biosolids data from the Form 43 and 503 analyses are summarized in the Monitoring Data Spreadsheet received by e-mail from the EPA. These are included in **Appendix 8**. The monthly average for BOD, TSS, NH<sub>3</sub>-N, and Phosphorus for the plant influent was added to the Monitoring Data Spreadsheet. Data from the two major influent points of the plant was added to the Monitoring Data Spreadsheet as two separate tabs.

Additional testing that the City performed for bis(2-Ethylhexyl)phthalate or semivolatiles on the plant influent points, plant effluent and biosolids is included in **Appendix 8**. This was done on at least a monthly basis until the issuance of a new draft permit confirmed that the City's WWTP did not need to continue this additional sampling.

A spreadsheet is also included showing the results and quarterly average of testing performed for TKN, Total Phosphorus and ortho-phosphate on the influent in 2013.

Biosolids testing for the year showed the typical higher level of molybdenum in the summer months. The City identified cooling tower chemicals as an important source of this metal. All permittees are required to test for molybdenum at least once a year and the City tests for molybdenum as well. The City ensures that permits require testing for this metal in the summer months. No major source of molybdenum has been found at any industrial user. The City has been encouraging the elimination of molybdenum containing cooling tower chemicals among its industrial users, non-industrial users and contributing municipalities. All metals in the biosolids meet land application concentration limits except for molybdenum in the summer months. There were no maintenance activities performed in those months that would potentially explain the reason for the elevated levels. The City continues to landfill all biosolids from the wastewater treatment plant but would like to be able to consider other disposal options in the future.

In a letter from DEP dated August 31, 2004, the effluent limit for mercury was amended. The new limit which is a monthly average is 0.00023 mg/L. A copy of the letter and the discharge limitations showing the amended mercury limit is enclosed. The Monitoring Data Spreadsheet lists 0.00007 mg/L as the effluent goal which had been the NPDES permit limit prior to the amendment. The newly-received NPDES permit does not have a limit or requirement for mercury testing.

No trucked or hauled wastewater or brine waste is accepted at the plant or within the collection system. In 2006, Dietrich's Milk Products began collecting some of its high strength wastewater as part of its program to comply with its oil and grease limit. This is primarily first flushes during equipment cleanup after milk processing. In 2008, Clover Farms Dairy also began segregating some of its high strength wastewater to control oil and grease discharges. Documentation on individual waste streams that are collected for off site disposal (i.e. hazardous waste, used oil, sludges) by industrial users is reviewed during facility inspections.

## **II – Pretreatment Program Changes**

During 2013, there were no changes in the legal authority.

The City continues to use both the PreWin commercial software program as well as a custom spreadsheet developed by the Environmental Program Coordinator for tracking compliance. This system of checks and balances ensures that all deadlines, milestones, notices of violation, and significant non-compliance will be accurately reflected and reported.

The WWTP laboratory, which performs conventional analyses for the wastewater treatment plant and industries, received accreditation in January 2008 under Pennsylvania's Chapter 252, Environmental Laboratory Accreditation. The laboratory has maintained its accreditation since that time. A renewal application was submitted in December 2011. Accreditation has been renewed through January 31, 2015. The scope of accreditation is for the following parameters: BOD, cBOD, TS, TSS, TDS, fecal coliform, ammonia as nitrogen and distillation for ammonia as nitrogen.

A laboratory technician who had been performing the duties of the Environmental Program Coordinator on a trial basis was offered and accepted the position on a permanent basis. He began his permanent duties January 1, 2013. In November 2013, a laboratory technician bid into a position on the operations staff of the wastewater plant. A personnel search was conducted in a prompt, professional manner. The technician's replacement was not hired before the end of 2013. The wastewater laboratory was staffed with four laboratory technicians from November 2013 until the end of the year. Staffing up to that time included five laboratory technicians and a laboratory supervisor. Beginning in 2013, technicians were assigned the task of pretreatment industrial sampling on a rotating basis. Each of the technicians performed the sampling duties for one month.

### **III – Miscellaneous Developments**

During March 2003, legal counsel for the City was requested by the United States Department of Justice to meet concerning permit violations of the wastewater treatment plant. As a result of this and subsequent meetings, the City of Reading has a Consent Decree with the United States Department of Justice, United States Environmental Protection Agency, and Pennsylvania Department of Environmental Protection in order to address past permit violations and to obtain consistent permit compliance for the future. This Consent Decree addresses the wastewater treatment plant, collections system, and industrial pretreatment program. The negotiations for this Consent Decree were completed and the decree executed by all parties in 2004. On December 9, 2004, the US Attorney announced that an agreement had been reached between the parties, and the complaint and decree were lodged with the judge simultaneously. This was subsequently advertised for a thirty-day public comment period which continued into 2005. The Consent Decree was officially signed by the judge and entered on November 7, 2005. This Consent Decree dictates many interim improvements and systems to be implemented while the City embarks on studies of both the WWTP and collection system prior to beginning a capital improvement plan.

For the Consent Decree interim remedial measures, there is the ongoing implementation and refinement of the Environmental Management System, Wet Weather Operations Plan, and the Operations and Maintenance Plan. Additionally, the Plant Influent, Trickling Filter Performance, and Process Control Monitoring are continuing as described in their respective submissions as required.

The long-term remedial measures for the WWTP upgrades, includes the liquid and solid treatment alternatives required by the Consent Decree. Additionally, the collection system has goals to improve mapping, operations, and maintenance through a regimented process leading to system rehabilitation. Engineering consulting contracts related to these capital projects were awarded in 2013.

The City continues to work to improve the wastewater system as a whole and plan for capital improvements. Periodic reports to the regulators and meetings with the regulators document the City's progress and concerns, especially related to progress and milestone deadlines.

Appendix 1  
Current Industrial Users

**2**

Appendix 2  
Compliance Monitoring Program

**3**

Appendix 3  
Increased Industrial Sampling

**4**

Appendix 4  
Facilities in SNC for 2013 that were  
also in SNC for 2012

**5**

Appendix 5  
Newspaper Listing of Significant  
Violators

**6**

Appendix 6  
Enforcement Actions

**7**

Appendix 7  
Payment Status

**8**

Appendix 8  
Data Monitoring Spreadsheet  
Analytical Results

## **2013 Pretreatment Report Appendices**

<b>Appendix 1 -</b>	<b>Current Industrial Users</b>
<b>Appendix 2 -</b>	<b>Compliance Monitoring Program</b>
<b>Appendix 3 -</b>	<b>Increased Industrial Sampling</b>
<b>Appendix 4 -</b>	<b>Facilities in SNC for 2013 that were also in SNC for 2012</b>
<b>Appendix 5 -</b>	<b>Newspaper Listing of Significant Violators</b>
<b>Appendix 6 -</b>	<b>Enforcement Actions</b>
<b>Appendix 7 -</b>	<b>Payment Status</b>
<b>Appendix 8 -</b>	<b>Data Monitoring Spreadsheet</b>
	<b>Analytical Results</b>